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BELLSOUTH
TELECOMMUNICATIONS 

Joseph R. Wilson
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Rc

June 30, 1994

Mr. Thomas P. Byrnes
Regional Vice President
Teleport Communications Group, Inc.
1 Teleport Drive, Suite 302
Staten Island, New York 10311

Dear Mr. Byrnes:

Thank you for the opportunity to clarify BellSouth Telecommunications, Inc.'s (BST) tariff F.C.C. No. 1 and operations relative to Expanded Interconnection Service.

The attached document contains our responses to your specific area of concern. These responses are based on existing tariffs and do not take into consideration the Court's opinion relative to Expanded Interconnection Service.

I would like to thank you for your understanding in developing this response and the time you spent with our Regulatory and Pricing group to clarify specific topics.

I would also like to extend an invitation to you and your staff to meet with BST at your convenience to discuss specific issues and projects. We feel that an informed customer is the best customer. We will do our best to insure that you always know how to do business with BellSouth.

Thank you again for the opportunity to clarify our tariff and processes relative to BST access services.

Sincerely,



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TO 913054915812

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BELLSOUTH RESPONSE TO QUESTIONS OF TCG AS FORWARDED IN MAY 27, 1994 LETTER

QUESTION 1 Per BellSouth Transmittal No. 155, the charges for rollover of DS3 service from the IXC to TCG at the point of termination are:

- A. Nonrecurring charges per order of \$0.
- B. Nonrecurring charges per DS3 circuit reconfigured of \$0.
- C. Nonrecurring charges per DS3 cross connect of \$155.00 for the first cross connection, plus \$13.00 for each additional cross connection (on the same order).
- D. Recurring monthly charges of \$68.41 per DS3 cross connection.

RESPONSE: TCG is correct with regard to the application of nonrecurring charges provided that the customer of record remains the same, that the DS3 reconfiguration takes place in the existing POP serving wire center, and that there are no other physical changes to the service. However, it is our understanding that TCG wants to become the customer of record for the entire service arrangement involved. This can be accomplished in two ways: 1) the existing customer can disconnect its service at the POP and TCG can re-install the service (including the DS3 cross connect and excluding the local channel) at the expanded interconnection service ("EIS") location (in which case full installation charges, rather than reconfiguration charges, would apply); or 2) the existing customer can transfer the service to TCG (for which Transfer of Service charges apply) and then TCG, as the new customer, can request a reconfiguration of the arrangement to the EIS location (for which the foregoing reconfiguration charges also apply). Finally, recurring rates are applicable not only for the DS3 cross connect but the remaining elements involved in the service arrangement (e.g. interoffice channels, etc.).

QUESTION 2 Per BellSouth Transmittal No. 167, the charges for rollover of DS3 switched local transport service from the IXC to TCG at the point of termination are:

- A. Nonrecurring charges per order of \$41.00.
- B. Nonrecurring charges per DS3 circuit reconfigured of \$69.00.
- C. Nonrecurring charges per DS3 Channelization of \$145.45.
- D. Nonrecurring charges per DS3 cross connect of \$155.00 for the first cross connection, plus \$13.00 for each additional cross connection (on the same order).
- E. Recurring monthly charges of \$68.41 per DS3 cross connection.

RESPONSE: As indicated in the response to question 1, the above-listed charges (except for the channelization charge) would be correct assuming that the customer of record remains the same.

center, that either the existing customer already had channelization at the serving wire center involved or no channelization at the serving wire center is involved at all, that a transfer of the service from the existing customer to TCG was accomplished prior to the reconfiguration and that no other changes are made to the service as a part of the reconfiguration. If channelization is being added at the serving wire center, a disconnect and re-installation would have to be involved. Of course, the change could also be accomplished by a disconnect and reinstallation of the entire service arrangement in lieu of a reconfiguration. As above, recurring charges would apply not only for the cross connect element but for other rate elements involved in the service arrangements (e.g., interoffice channels, etc.)

QUESTION 3 When converting (or rolling over) an IXC DS3 to TCG access, the tariff indicates no charges for redesignating the ownership of subtending DS1 and DS0 service to TCG. Further, the TCG expectation is that the physical layout of these circuits remain intact including the cable, pair, and circuit identification.

RESPONSE: Transfer of service charges apply for a change in the customer of record from one customer to another. Where physical changes in the service are requested to be made simultaneously with a change in customer of record, the activity would not be a transfer of service but would be a disconnect of the service provided to the old customer and a new installation of the service to be provided to the new customer. A transfer of service does not require a change to the physical layout of the circuits, including the cable, pair, and circuit identification. If a transfer of service is accomplished first, and a reconfiguration accomplished next, the circuit identification on the higher level service will change (the DS3 level for questions 1 and 2) and the circuit facility assignments ("CFAs") on the lower level services will change.

QUESTION 4 Maximum termination liabilities are limited to the channel termination portion of the recurring charges and do not include the mileage or muxing charges.

RESPONSE: Maximum termination liabilities are associated with special access services ordered by customers under Channel Service Payment Plan (CSPP) provisions. Those liability provisions vary by the services to which they apply, e.g., DDAS, DS1, and LightGate service, and generally apply to all rate elements placed under a CSPP plan. There are no termination liabilities under the current tariff for switched access services.

Specifically, for LightGate service, only the portions of service

A review of the Tr. No. 167 filing indicates that the illustration from which the quoted charges were taken

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which are disconnected prematurely before the end of the commitment period incur termination liability at the time of that disconnect. For DSI special access service provided under a CSPP commitment, termination liability would generally apply to the entire DSI service where any DSI service rate element is disconnected. However, where the local channel is disconnected as a part of a reconfiguration to a DSI cross connect in the same serving wire center, under the assumptions set forth in the response to question 1, termination liability would only apply to the DSI local channel which is disconnected as a part of the reconfiguration.

QUESTION 5 Per BellSouth Transmittal No. 155, the charges for rollover of DSI special access service from the IXC to TCG at the point of termination are:

- A. Nonrecurring charge per reconfiguration order of \$41.00.
- B. Nonrecurring charge per DSI circuit reconfigured \$64.00.
- C. Nonrecurring charges per DSI cross connect of \$155.00 for the first cross connection, plus \$14.00 for each additional cross connection (on the same order).
- D. Recurring monthly charges of \$7.92 per DSI cross connection.

RESPONSE: The foregoing charges would be correct provided that the customer of record remains the same, that the reconfiguration takes place in the existing POP serving wire center, and that there are no other physical changes to the service. If TCG wants to become the customer of record for the entire service arrangement, then that could be accomplished by either of the two alternatives listed in the response to question 1: 1) disconnect and re-installation; or 2) transfer of the service by the old customer to TCG and then reconfiguration by TCG to the EIS location. As above, recurring rates apply for all monthly rate elements, not just the cross connection.

QUESTION 6 Per BellSouth Transmittal No. 167, the charges for rollover of DSI switched local transport service from the IXC to TCG at the point of termination are:

- A. Nonrecurring charge per reconfiguration order of \$41.00.
- B. Nonrecurring charge per DSI circuit reconfigured of \$64.00.
- C. Nonrecurring charge per DSI cross connect of \$155.00 for the first cross connection, plus \$14.00 for each additional cross connection (on the same order).
- D. Recurring monthly charges of \$7.92 per DSI cross connection.

RESPONSE: See response to question 5.

QUESTION 7 There are no tariff charges for cross-connects of DSO

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DS1, the subtending DS0 circuits carry no redesignation charges. Also, the TCG expectation is that BellSouth will keep the cable, pair and circuit identification intact.

RESPONSE: BellSouth's tariff does not provide either for DS0 cross connects or charges for DS0 cross connects. As indicated in the response to question 3 above, transfer of service charges apply for a change in the customer of record from one customer to another. Where physical changes in the service are requested to be made simultaneously with a change in customer of record, the activity would be considered a disconnect of the service provided to the old customer and a new installation of the service to be provided to the new customer. Cable, pair and circuit identification would be handled as indicated in the response to question 3.

QUESTION 8 BellSouth Transmittal No. 194 has been filed to waive nonrecurring reconfiguration charges associated with Local Transport Restructure. Does this or any other waiver apply to Interconnectors?

RESPONSE: The waiver applies for qualifying rearrangements of switched access services provided prior to the local transport restructure. The waiver would apply for rearrangements of such services assuming all other conditions specified in the tariff waiver provision are met.

QUESTION 9 The beginning of the "fresh look" rules are when a collocater makes the first cross connect of service in the cage to a customer and BellSouth publishes that information in its tariff. If this is not true, when is the beginning of the fresh look period? Could TCG be notified by BellSouth of each tariff change? Will all orders placed in the period be treated under the fresh look parameters?

RESPONSE: The only service which BellSouth has which would qualify for "fresh look" are several SMARTRing services which were entered into on or before September 17, 1992. The "fresh look" provision would be triggered when there are operational expanded interconnection arrangements in all of the central offices of a given qualifying SMARTRing service. BellSouth would then file notice of the fresh look period in its tariff and the 180-day "fresh look" period would begin to run from the date of such filing. BellSouth does not plan to provide individual notification to customers when a fresh look period begins.

QUESTION 10 TCG's expectation is BellSouth will convert the billing of an IXC's subtending DS1 and DS0 services on a rollover DS3 to TCG as the billed customer without charge. Is a letter of Authorization required from the IXC? How many billing conversions can BellSouth perform in a day, week, or month?

RESPONSE: Transfer of service charges apply for changing the

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and new installation, as indicated in the responses to questions 3 and 7. In order to accomplish a transfer of service, a "Letter of Authorization" is not the form to be utilized. Written notification of the existing customer's transfer to the subsequent customer is required, the new customer must assume all outstanding indebtedness for the service, including the unexpired portion of any minimum period and any termination liability applicable to such service, and the written acknowledgment of BellSouth is required prior to any such assignment or transfer. The applicable forms are "Statement of Assumption of Access Services and All Outstanding Indebtedness and Future Charges" and "Authorization for Transfer and Release Notice." The number of "billing conversions" which can be accomplished within any given period of time will depend upon the particular circumstances involved and the overall workload at that time.

QUESTION 11. The IXC disconnect order for a rolled DS3 service must have a corresponding connect order from TCG before BellSouth's [sic: BellSouth] can work on it. This must be coordinated and outlined before the plant test data.

RESPONSE: When BellSouth receives an order for a disconnect, BellSouth has no way of knowing that the order is associated with a connect order unless the disconnect order is so noted. Therefore, if the involved customers want BellSouth to coordinate the orders, it is up to them to provide to BellSouth information on their respective orders which will enable BellSouth to provide such coordination. Should TCG so desire, BellSouth is willing to meet with TCG and the other involved customers to make plans for the conversion and its timing and to determine whether project status is warranted.

QUESTION 12 What are your methods and procedures for insuring a seamless transition of services via the rollover process? How many DS3's can be physically rolled per day, week, month?

RESPONSE: BellSouth cannot guarantee a "seamless" transition for any of its customers, to the extent this means that no interruptions will ever occur. A "seamless" conversion could only be assured by the utilization of duplicate facilities. However, BellSouth urges customers planning reconfigurations or conversions to request project handling and to meet with BellSouth to discuss plans and to work out a means by which to best and most efficiently handle the project satisfactorily to both BellSouth and the customer. The number of "physical rolls" of DS3 services which can be handled in any given time period depends upon the specific requests made and changes involved as well as the overall workload of the involved BellSouth work groups during that period of time.

QUESTION 13 If TCG were to provide only the DS3 to the M13 multiplexor for an IXC, can BellSouth bill the IXC for the subsuming DS1 and DS0 services?

EXHIBIT F

Theodore R. Kingsley
General Attorney

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404 249-3392
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April 21, 1997

VIA FACSIMILE, FOLLOWED BY OVERNIGHT MAIL

Edward A. Yorkgitis, Jr., Esq.
Kelley Drye & Warren
1200 19th Street, N.W., Suite 500
Washington, D.C. 20036

Re: ACSI v. BST
File No. E-96-20

Dear Chip:

This letter is in response to the various requests for clarification that you left me in your March 24, 1997 voice mail, and specifically to those that have not been resolved by ACSI's Motions to Compel, BST's Oppositions, and ACSI's March 27, 1997 letter to Secretary Caton.¹ As an initial matter, we acknowledge and thank you for your cooperation in resolving these issues.

(1) Clarification as to the term LIGHTGATE.

LIGHTGATE® is a registered service mark of BellSouth Corporation for telecommunications services that is used by BellSouth affiliates in connection with marketing point to point DS3 services. The phrase "point to point DS3" instead of the service mark LIGHTGATE should have been used in our Second Supplemental Answer. Thus, our Second Supplemental Answer should read as follows:

¹ ACSI's requests for clarification of BellSouth's supplemental response to Interrogatory 2(b)(4), objection to BellSouth's supplemental response to Interrogatory 6, and request for additional information arising out of BellSouth's supplemental response to Interrogatory 8 have been so resolved.

2 (b)(4) BellSouth to BellSouth

No work is performed on a reconfigured point to point system link. The incremental cost incurred by BellSouth in accommodating an ACTL move for an existing BellSouth point to point DS3 System [DS3] where the DS3 local channel is being reconnected from one POP location to another POP in the same serving wire center, is equal to the charge for a new local channel system as well as associated channel interfaces for the new local channel. When there is a request to reconfigure a Special Access DS3 circuit at the serving wire center end of the POP to POP move, no work is performed on a remaining point to point DS3 System Link. All work efforts to connect service to the POP location are accounted for in the new local channel system charge and channel interface charges. Since the connecting DS3 local channel remains the same at the other end of the service, there are no record changes required. Therefore, there are no reconfiguration work efforts associated with connecting the DS3 local channel. On channelized point to point DS3 Systems, all individual DS1 and DS0 Local and/or interoffice channels must be reconfigured and the circuit records changed to reflect the new termination location. See response to Interrogatory 2(a)(1).

BellSouth to CAP

No work is performed on a reconfigured point to point DS3 system link. Therefore, no incremental cost incurred by BellSouth in accommodating an ACTL move from a POP to a competitive access provider that reconfigures a point to point DS3 System [DS3] where the DS3 local channel is being re-established to a collocated arrangement. All work efforts to connect service to the collocated arrangement are accounted for in the Expanded Interconnection DS3 cross-connect element. Since the existing DS3 local channel remains the same, there are no record changes required. Therefore, there are no reconfiguration work efforts associated with the existing DS3 local channel. On channelized point to point DS3 Systems, all individual DS1 and DS0 local and/or interoffice channels must be reconfigured and the circuit records changed to reflect the new termination location. See response to Interrogatory 2(a)(1).

(2) Clarification of BellSouth's February 24, 1997 letter, item No. xi, page 3 (why the time for a DS3 would change).

As BellSouth stated previously, the time necessary to process a "first circuit" is always longer than the time necessary to process "additional circuits." Once the necessary creation, design and set-up function criteria are established to process the first circuit there is no need for these functions to be repeated for each additional circuit. For example, there is time associated with these functions for the initial log-in to the Circuit Provisioning Center [CPC] for the first circuit. Such time is not a part of any additional circuits in the same order. Setting up the initial circuit [or the initial log-in] by CPC establishes the criteria for the circuit and its record[s]. Once the criteria is established for the initial circuit and its records, the criteria for the additional circuits and their records is the same, and though it need not be recreated anew, it must be posted and/or updated for all additional circuits. Such subsequent posting and updating for additional circuits would not take as long as the first.

(3) Request for documents.

Because BellSouth has already provided relevant documents, and because the Commission has determined that additional discovery in the form of document production is not required of BellSouth, BellSouth declines to provide additional documents.

(4) Clarification as to whether BellSouth's response to Interrogatory No. 5 applies to both DS3s and DS1s.

Interrogatory No. 5 applies to both DS3s and DS1s.

(5) Clarification concerning the second paragraph of item No. 6 of BellSouth's February 24, 1997 letter. ("BellSouth indicated that a response to this item would be forthcoming.")

The response should be changed from "Response forthcoming" to "Interrogatory No. 5 has been updated to reflect supplemental responses to Interrogatory No. 7. The supplemental responses to Interrogatory No. 8 all involved BST to BST reconfigurations."

Very truly yours,


Theodore R. Kingsley

cc: Darius B. Withers, Esq.

EXHIBIT G

Respondent, BellSouth Telecommunications, Inc. ("BellSouth") , by its attorneys, pursuant to Section 1.729(a), of the Commission's Rules, 47 C.F.R. § 1.729(a), and the Order entered in this matter on April 25, 1996, hereby answers the Interrogatories served on it by Complainant in the above referenced docket. Responding to each numbered question, Respondent states the following:

GENERAL OBJECTIONS:

General Objection No. 1:

BellSouth objects to each interrogatory to the extent it seeks information that is subject to the attorney-client privilege, information that is immune from discovery under the attorney work product doctrine, or information otherwise protected from disclosure under the Commission's Rules or the Federal Rules of Civil Procedure and relevant case law.

General Objection No. 2:

BellSouth objects to each interrogatory to the extent it seeks information that is not relevant to this proceeding.

General Objection No. 3:

BellSouth objects to complainant's instructions and definitions to the extent that they purport to impose requirements that are not authorized by the Commission's rules, are overbroad and unduly burdensome.

General Objection No. 4:

BellSouth objects to each and every interrogatory to the extent it seeks information or documents that are not in BellSouth's possession, custody, or control.

Interrogatory No. 1. Identify all provisions in BellSouth's tariffs on file with the FCC that relate to the calculation of ACTL Move Nonrecurring Charges or to the waiver of ACTL Move Nonrecurring Charges. Answer this Interrogatory for all tariffs on file with the FCC between October 1, 1994, to present.

ANSWER No. 1:

Regulations regarding ACTL moves are or were shown on the following tariff pages of the BellSouth Telecommunications Inc.'s Tariff F.C.C. No. 1. These tariffs were or are in effect as of the dates shown, per the revision level of the page.

For Switched Access; Section 6.7.7 Moves -

Tariff F.C.C. No. 1, 3rd Revised Page 6-141 cancels 2nd Revised Page 6-141,
Effective: April 5, 1995;

Tariff F.C.C. No. 1, 2nd Revised Page 6-141 cancels 1st Revised Page 6-141,
Effective: February 16, 1994;

Tariff F.C.C. No. 1, 1st Revised Page 6-141.1 cancels Original Page 6-141.1,
Effective: April 5, 1995;

Tariff F.C.C. No. 1, Original Page 6-141.1, Effective: February 16, 1994;

For Special Access; Section 7.4.5 Moves -

Tariff F.C.C. No. 1, 6th Revised Page 7-79 cancels 5th Revised Page 7-79,
Effective: April 16, 1995;

Tariff F.C.C. No. 1, 5th Revised Page 7-79 cancels 4th Revised Page 7-79,
Effective: June 24, 1994;

Tariff F.C.C. No. 1, 3rd Revised Page 7-80 cancels 2nd Revised Page 7-80,
Effective: April 5, 1995;

Tariff F.C.C. No. 1, 2nd Revised Page 7-80 cancels 1st Revised Page 7-80,
Effective: December 2, 1993;

Tariff F.C.C. No. 1, Original Page 7-80.1, Effective: December 2, 1993.

The IFCPC is involved in the activities required to determine and assign the interoffice facilities. The Center receives the order(s) and reviews the Facility and Equipment Planning System (FEPS) database, checking interoffice facilities and equipment. The IFCPC then changes the reconfigured DS1 records to reflect the current interoffice facilities and equipment.

The work functions described in detail above outlines the work flow to accomplish the "First" circuit in a group of circuits for the same customer to be reconfigured. This work effort reflects costs on a Per Request basis and is listed as such in BellSouth Telecommunications, Inc.'s Tariff F.C.C. No. 1. All "Additional" circuits in that group were studied on a Per Circuit basis and listed as such in the tariff.

ANSWER No. 2(a)(2): (Consistent with Instruction No. 2, and with the Commission's Rules, each subpart of interrogatory no. 2 is answered and numbered separately) Switched Access Services: The incremental cost incurred by BellSouth in accommodating a switched access ACTL move by an existing BellSouth customer that reconfigures a DS1 switched access circuit from BellSouth facilities to a competitive access provider's facilities is the result of the work efforts of various work groups within BellSouth. Those work groups are: the ICSC, the CPC, the IFCPC, the SSCTTC, and the Switching Control Center (SCC).

When the ICSC receives an (ASR) from the customer for reconfiguration, the ICSC is responsible for correcting and screening all data inputs on the ASR and for making any necessary manual inputs to the ASR. The screening process involves

verification of BOCABS records and cross-reference of TIRKS records. All billing information is updated to assure proper billing. The ICSC then creates a service order for each circuit and distributes the reconfiguration service order request(s) to the CPC work group. This process applies to each DSO circuit on the DS1 circuit.

The CPC receives each request and manually logs the order(s) into the SOAC system for scheduling purposes. The facilities are reviewed by the CPC to make certain that all equipment is accounted for in the facility design records. All records are updated and the order is disbursed to IFCPC, SSCTTC and SCC. Assistance is provided as required, by the CPC, to field forces who perform the work to resolve any order discrepancies.

The SSCTTC performs the overall control function for switched access services. The Center receives and analyzes each request for accuracy, tracks each order and posts the order completion.

The SCC is responsible for performing the necessary central office connections and testing for switched access services. The SCC is notified of the reconfiguration request through the service order from the CPC. The SCC accesses the existing database and verifies that existing records match the reconfiguration order and updates the record(s) as required. The SCC verifies spare equipment and facilities, completes the circuit update and closes the order.

The IFCPC is involved in the activities required to determine and assign the interoffice facilities. The Center receives the order(s) and reviews the FEPS database, checking interoffice facilities and equipment. The IFCPC then changes

the reconfigured DS1 records to reflect the current interoffice facilities and equipment.

The work functions described in detail above outlines the work flow to accomplish the "First" circuit in a group of circuits for the same customer to be reconfigured. This work effort reflects costs on a Per Request basis and is listed as such in BellSouth Telecommunications, Inc.'s Tariff F.C.C. No. 1. All "Additional" circuits in that group were studied on a Per Circuit basis and listed as such in the tariff.

ANSWER No. 2(a)(3): (Consistent with Instruction No. 2, and with the Commission's Rules, each subpart of interrogatory no. 2 is answered and numbered separately) The incremental cost incurred by BellSouth in accommodating a switched access ACTL move by an existing BellSouth customer that reconfigures a DS3 switched access circuit from BellSouth facilities to a competitive access provider's facilities is the result of the work efforts of various work groups within BellSouth. Those work groups are: the ICSC, the CPC, the IFCPC, the SSCTTC, and the SCC.

When the ICSC receives an ASR from the customer for reconfiguration, the ICSC is responsible for correcting and screening all data inputs on the ASR and for making any necessary manual inputs to the ASR. The screening process involves verification of BOCABS records and cross-reference of TIRKS records. All billing information is updated to assure proper billing. The ICSC then creates a service order for each circuit and distributes the reconfiguration service order request(s) to

the CPC work group. This applies to each DS1 circuit on the DS3 circuit and to each DSO circuit on the DS1 circuit.

The CPC receives each request and manually logs the order(s) into the SOAC system for scheduling purposes. The facilities are reviewed by the CPC to make certain that all equipment is accounted in the facility design records. All records are updated and the order is disbursed to the IFCPC, SSCTTC and SCC. Assistance is provided, as required by the CPC, to field forces who perform the work to resolve any order discrepancies.

The SSCTTC performs the overall control function for switched access services. The Center receives and analyzes each request for accuracy, tracks each order and posts the order completion.

The SCC is responsible for performing the necessary central office connections and testing for switched access services. The SCC is notified of the reconfiguration request through the service order from CPC. The SCC accesses the existing database and verifies that existing records match the reconfiguration order and updates the record(s) as required. The SCC verifies spare equipment and facilities, completes the circuit update and closes the order.

The IFCPC is involved in the activities required to determine and assign the interoffice facilities. The Center receives the order(s) and reviews the FEPS database, checking interoffice facilities and equipment. The IFCPC then changes the reconfigured DS3 records to reflect the current interoffice facilities and equipment.

The work functions described in detail above outlines the work flow to accomplish the "First" circuit in a group of circuits for the same customer to be reconfigured. This work effort reflects costs on a Per Request basis and is listed as such in BellSouth Telecommunications, Inc.'s Tariff F.C.C. No. 1. All "Additional" circuits in that group were studied on a Per Circuit basis and listed as such in the tariff.

Interrogatory 2(b). Consistent with Instruction No. 2, describe in detail the TSLRIC incurred by BellSouth in accommodating an ACTL Move by an existing customer that reconfigures a DS1 or DS3 access facility with BellSouth. If TSLRIC information is not available, describe in detail the incremental costs based upon the information that is available.

ANSWER No. 2(b)(1): (Consistent with Instruction No. 2, and with the Commission's Rules, each subpart of interrogatory no. 2 is answered and numbered separately) 1) TSLRIC cost studies were not performed by BellSouth for these tariff regulations. Incremental cost studies were performed and are described as follows. The incremental cost incurred by BellSouth in accommodating a special access ACTL move by an existing BellSouth customer that reconfigures a DS1 special access circuit with BellSouth is the result of the work efforts of various work groups within BellSouth. Those work groups are: the ICSC, the CPC, the IFCPC, NTEC, NTEL, and the SSCTTC.

When the ICSC receives an ASR from the customer for reconfiguration, the ICSC is responsible for correcting and screening all data inputs on the ASR and for

making any necessary manual inputs to the ASR. The screening process involves verification of BOCABS records and cross-reference of TIRKS records. All billing information is updated to assure proper billing. The ICSC then creates a service order for each circuit and distributes the reconfiguration service orders request(s) to the CPC work group. This process applies to each DSO circuit on the DS1 circuit.

The CPC receives each request and manually logs the order(s) into the SOAC module of TIRKS for processing. The facilities are reviewed by the CPC to make certain that all existing equipment was reused. Any facility record that did not reuse existing equipment is identified and corrected. All records are updated and the order is disbursed to the NTEC/NTEL, IFCPC and SSCTTC. Assistance is provided, as required, by the CPC, to field forces who perform the work to resolve any order discrepancies.

The NTEC/NTEL is responsible for performing the necessary central office connections and testing for special access services. The NTEC is notified of the reconfiguration request through the service order request from CPC. NTEC logs the request and sends the request to the NTEL work group who accesses an existing database to verify that existing records match the reconfiguration order and updates all record(s) as required. NTEL then verifies spare equipment and facilities, completes the circuit update and closes the order.

The SSCTTC performs the overall control function for special access services. The Center receives and analyzes each request for accuracy, tracks each order and posts the order completion.

The IFPCPC is involved in the activities required to determine and assign the interoffice facilities. The Center receives the order(s) and reviews the FEPS database, checking for available interoffice facilities and equipment. IFPCPC then changes the reconfigured DS1 records to reflect the current interoffice facilities and equipment.

The work functions described in detail above outlines the work flow to accomplish the "First" circuit in a group of circuits for the same customer to be reconfigured. This work effort reflects costs on a Per Request basis and is listed as such in BellSouth Telecommunications, Inc.'s Tariff F.C.C. No. 1. All "Additional" circuits in that group were studied on a Per Circuit basis and listed as such in the tariff.

ANSWER No. 2(b)(2): (Consistent with Instruction No. 2, and with the Commission's Rules, each subpart of interrogatory no. 2 is answered and numbered separately) The incremental cost incurred by BellSouth in accommodating a ACTL move by an existing BellSouth customer that reconfigures a DS1 switched access circuit with BellSouth is the result of the work efforts of various work groups within BellSouth. Those work groups are the ICSC, the CPC, the IFPCPC, and the SSCTTC and the SCC.

When the ICSC receives an ASR from the customer for reconfiguration, the ICSC is responsible for correcting and screening all data inputs on the ASR and for making any necessary manual inputs to the ASR. The screening process involves verification of BOCABS records and cross-reference of TIRKS records. All billing

information is updated to assure proper billing. The ICSC then creates a service order for each circuit and distributes the reconfiguration service order request(s) to the CPC work group. This process applies to each DSO circuit on the DS1 circuit.

The CPC receives each request and manually logs the order(s) into the SOAC system for scheduling purposes. The facilities are reviewed manually to make certain that all existing equipment was reused. Any facility record that did not reuse existing equipment is identified and corrected. All records are updated and the order is disbursed to the IFCPC, SSCTTC and SCC. Assistance is provided, as required by CPC, to field forces who perform the work to resolve any order discrepancies.

The SSCTTC performs the overall control function for switched access services. The Center receives and analyzes each request for accuracy, tracks each order and posts the order completion.

The SCC is responsible for performing the necessary central office connections and testing for switched access services. The SCC is notified of the reconfiguration request through the service order from the CPC. The SCC accesses the existing database and verifies that existing records match the reconfiguration order and update the record(s) as required. The SCC verifies spare equipment and facilities, completes the circuit update and closes the order.

IFCPC is involved in the activities required to determine and assign the interoffice facilities. The Center receives the order(s) and reviews the FEPS

database, checking interoffice facilities and equipment. IFCPC then changes the reconfigured DS1 records to reflect the current interoffice facilities and equipment.

The work functions described in detail above outlines the work flow to accomplish the "First" circuit in a group of circuits for the same customer to be reconfigured. This work efforts reflects costs on a Per Request basis and is listed as such in BellSouth Telecommunications, Inc.'s, Tariff F.C.C. No. 1. All "Additional" circuits in that group were studied on a Per Circuit basis and listed as such in the tariff.

ANSWER No. 2(b)(3): (Consistent with Instruction No. 2, and with the Commission's Rules, each subpart of interrogatory no. 2 is answered and numbered separately) The incremental cost incurred by BellSouth in accommodating a ACTL move by an existing BellSouth customer that reconfigures a DS3 switched access circuit with BellSouth is the result of the work efforts of various work groups within BellSouth. Those work groups are: the ICSC, the CPC, the IFCPC, the SSCTTC and the SCC.

When the ICSC receives an ASR from the customer for reconfiguration, the ICSC is responsible for correcting and screening all data inputs on the ASR and for making any necessary manual inputs to the ASR. The screening process involves verification of BOCABS records and cross-reference of TIRKS records. All billing information is updated to assure proper billing. The ICSC then creates a service order for each circuit and distributes the reconfiguration service order request(s) to

the CPC work group. This process applies to each DS1 circuit on the DS3 circuit and to each DSO circuit on the DS1 circuit.

The CPC receives each request and manually logs the order(s) into the SOAC system for scheduling purposes. The facilities are reviewed to make certain that all existing equipment was reused. Any facility record that did not reuse existing equipment is identified and corrected. All records are updated and the order is disbursed to the IFCPC, SSCTTC and SCC. Assistance is provided, as required by the CPC, to field forces who perform the work to resolve any order discrepancies.

The SSCTTC performs the overall control function for switched access services. The Center receives and analyzes each request for accuracy, tracks each order and posts the order completion.

The SCC is responsible for performing the necessary central office connections and testing for switched access services. The SCC is notified of the reconfiguration request through the service order from the CPC. The SCC accesses the existing database and verifies that existing records match the reconfiguration order and updates the record(s) as required. The SCC verifies spare equipment and facilities, completes the circuit update and closes the order.

The IFCPC is involved in the activities required to determine and assign the interoffice facilities. The Center receives the order(s) and reviews the FEPS database, checking interoffice facilities and equipment. The IFCPC then changes the reconfigured DS3 records to reflect the current interoffice facilities and equipment.

ANSWER No. 2(d): (Consistent with Instruction No. 2, and with the Commission's Rules, each subpart of interrogatory no. 2 is answered and numbered separately) Incremental cost studies which support the tariff regulations in Section 6.7.7 moves for switched access and Section 7.4.5 moves for special Access are attached. This cost study was filed with BellSouth Transmittal No. 267; dated February 24, 1995 as Appendix A. Copy attached.

Interrogatory No. 3. Describe in detail for DS1 and DS3 access facilities (a) the differences among the various ACTL Moves referenced in BellSouth's access tariffs on file with the FCC and (b) the differences between ACTL Moves and reconfigurations of access facilities that qualify for BellSouth's Network Optimization Waiver. This Interrogatory should be answered from the standpoint of detailing the various steps that must be taken by BellSouth with respect to implementing each type of reconfiguration.

ANSWER No. 3:

(3)(a) There are several types of ACTL moves described in BellSouth Telecommunications, Inc.'s Tariff FCC No. 1. The relevant sections of the Tariff are Section 6.7.7 Moves for Switched Access Services and Section 7.4.5 Moves for Special Access Services.

Moves are segregated in the Tariff by "(A) Moves Within the Same Building" and "(B) Moves to a Different Building". Moves within the same building are considered to be moves inside the customer's, with no other changes.